

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

2 Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
3 Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
4 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
5 Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted pro hac vice)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted pro hac vice)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

7 Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
8 Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
9 Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
10 Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
11 865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
12 Telephone: (213) 443-3000
13 Facsimile: (213) 443-3100

Josef Ansorge (admitted pro hac vice)
josefansorge@quinnemanuel.com
Xi (“Tracy”) Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted pro hac vice)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

14 Jomaire Crawford (admitted pro hac vice)
jomairecrawford@quinnemanuel.com
15 51 Madison Avenue, 22nd Floor
16 New York, NY 10010
17 Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

18 *Attorneys for Defendant Google LLC*

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

21 CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
22 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
23 situated,

Case No. 4:20-cv-03664-YGR-SVK

24 Plaintiffs,

**GOOGLE LLC'S SUPPLEMENT TO
ADMINISTRATIVE MOTION
UPDATING THE COURT ON ITS
PRESERVATION IMPLEMENTATION
EFFORTS AND SEEKING RELIEF
FROM THE JULY 30 DEADLINE
IMPOSED BY THE JULY 15, 2022
PRESERVATION ORDER (DKT. 630)**

25 v.

Judge: Hon. Susan van Keulen

26 GOOGLE LLC,
27 Defendant.
28

1 In response to the Court’s Order following July 28, 2022 Status Conference in *Calhoun v.*
2 *Google* (Case No. 4:20-cv-05146-YGR, Dkt. 789), Google hereby provides anticipated dates of
3 completion for items identified in its administrative motion as “in progress” or for which it has
4 requested additional time.

5 The engineering and resources required to implement aspects of the Court’s preservation
6 order (Dkt. 630) are unprecedented for Google. The Order requires numerous subject matter experts
7 to re-engineer Google systems and processes, and in some cases to create new systems and
8 processes. As these experts have worked diligently towards meeting the Court’s deadline, new
9 challenges have arisen on an almost daily basis, requiring more meetings, creative thinking, and
10 consultation with counsel to ensure the solutions ultimately arrived at satisfy the Court’s objective.

11 The problem is not merely one of manpower or server space—though those are issues as
12 well. Implementing certain aspects of the Court’s Order requires unique skills, experience, and
13 knowledge of particular data sources that are in limited supply, even at a company the size of
14 Google. Indeed, to date, 17 Google subject matter experts have been working to design, scope, and
15 implement the pipelines necessary to meet the order (Dkt. 630). In addition to resources, Google
16 needs time.

17 Google acknowledges the Court’s admonition that it “will not grant open-ended extensions
18 or any extension in excess of 30 days.” (4:20-cv-05146-YGR, Dkt. 789 at 2. And Google will
19 continue to work expeditiously to complete all remaining tasks as quickly as possible. But based on
20 the complexity of the tasks and progress to date, completion of all tasks in 30 days simply is not
21 possible.

22 The current status of the preservation projects in progress are set forth below. Upon the
23 Court’s request, Google is willing to provide more detailed explanations as to each task or answer
24 specific questions of the Court.

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	Data Source	Responsible Team	Anticipated Date of Completion
1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]
3			[REDACTED]
4			[REDACTED]
5			[REDACTED]
6			[REDACTED]
7			[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]
9			[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]
11			[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]
13			[REDACTED]
14			[REDACTED]
15			
16			
17			

18 DATED: July 29, 2022

19 QUINN EMANUEL URQUHART &
SULLIVAN, LLP

20 By /s/ *Andrew H. Schapiro*
21 Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
22 Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
23 Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

24 Stephen A. Broome (CA Bar No. 314605)

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¹ See Dkt. 587 at 7; Dkt. 587-1, Index ## 2-42, 52-56, 59, 60.

² See Dkt. 587-1, Index # 47, 48, 49.

³ See Dkt. 587-1, Index ## 43, 45.

1 stephenbroome@quinnmanuel.com
2 Viola Trebicka (CA Bar No. 269526)
3 violatrebicka@quinnmanuel.com
4 Crystal Nix-Hines (Bar No. 326971)
5 crystalnixhines@quinnmanuel.com
6 Alyssa G. Olson (CA Bar No. 305705)
7 alyolson@quinnmanuel.com
8 865 S. Figueroa Street, 10th Floor
9 Los Angeles, CA 90017
10 Telephone: (213) 443-3000
11 Facsimile: (213) 443-3100

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13 dianedoolittle@quinnmanuel.com
14 Sara Jenkins (CA Bar No. 230097)
15 sarajenkins@quinnmanuel.com
16 555 Twin Dolphin Drive, 5th Floor
17 Redwood Shores, CA 94065
18 Telephone: (650) 801-5000
19 Facsimile: (650) 801-5100

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21 josefansorge@quinnmanuel.com
22 Xi (“Tracy”) Gao (CA Bar No. 326266)
23 tracygao@quinnmanuel.com
24 Carl Spilly (admitted *pro hac vice*)
25 carlspilly@quinnmanuel.com
26 1300 I. Street, N.W., Suite 900
27 Washington, D.C. 20005
28 Telephone: 202-538-8000
Facsimile: 202-538-8100

29 Jomaire A. Crawford (admitted *pro hac vice*)
30 jomairecrawford@quinnmanuel.com
31 51 Madison Avenue, 22nd Floor
32 New York, NY 10010
33 Telephone: (212) 849-7000
34 Facsimile: (212) 849-7100

35 Jonathan Tse (CA Bar No. 305468)
36 jonathantse@quinnmanuel.com
37 50 California Street, 22nd Floor
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Attorneys for Defendant Google LLC